

BROOKHAVEN NATIONAL LABORATORY

SBMS Interim Procedure

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Title: Legal and Other Requirements

Point of Contact: Pat Williams

Management System: Occupational Safety and Health

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Applicability: Plant Engineering Division, Central Fabrication Services Division and Collider-Accelerator Department

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1. Purpose

- 1.1. This procedure is designed to ensure that BNL has identified relevant information on current health and safety statutes and regulations, as well as other requirements that it has established or adopted, and that BNL workers have continuing access to such information.

NOTE:

Requirements that apply to the activities conducted at BNL have several sources, including contract obligations, regulatory requirements, and formal commitments made by Laboratory management. BNL has established the [Requirements Management](#) Subject Area to identify and have access to legal and other requirements, including occupational safety and health requirements. The Requirements Management Subject Area describes receipt, initial processing, analysis of external requirement documents, and associated documentation. The Requirements Management Subject Area also ensures change control for processing new or revised external requirements and incorporates these changes into the affected documents.

2. Definitions

- 2.1. Refer to the Definitions contained in OHSAS 18001 Clause 3.

3. Responsibilities

- 3.1. Each Management System Steward is responsible for ensuring new or changed requirement documents, which are identified in the prime contract, are analyzed to determine their applicability to the Laboratory and for documenting the mechanisms that support compliance with the new or changed requirement.
- 3.2. Subject Matter Experts in the occupational health and safety support organizations are responsible for attending, where appropriate, professional conferences and training programs, and for reviewing on-line bulletin board services that post proposed changes to regulations applicable to the institution.
- 3.3. Subject Matter Experts (SMEs) are responsible for articulating new or changed regulations that impact the institution. Regarding the reporting of new or changed regulations, SMEs are responsible for maintaining direct communication with the SBMS Office requirements-point-of-contact.
- 3.4. The SBMS Office requirements-point-of-contact is responsible for coordinating the processing, reporting and posting of new or changed requirements for the institution.
- 3.5. Line managers are responsible for subscribing to the SBMS Notification Service in order to receive change notices for all new or changed requirements applicable to their operations.
- 3.6. When requested by line management, BNL personnel are responsible to participate on teams to develop or revise Subject Areas.

4. Scope

- 4.1. For specific OSH regulations, see Section 6 of [Management System Description: Occupational Safety and Health \(OSH\) \(Pilot for OSHAS 18001\)](#).
- 4.2. For Subject Areas related to OSH, see [SBMS](#).

5. Procedure

- 5.1. The Management System Steward shall ensure that BNL has timely information to anticipate changes in requirements, provide feedback to regulating agencies, and plan adequately for achieving compliance with new or changed requirements.

- 5.2. Once applicability of a new or changed requirement has been determined, the Management System Steward shall assess how the Laboratory currently complies or s/he shall determine the actions required for achieving compliance.
- 5.3. For new or changed requirements, the Management System Steward shall ensure the development or revision of appropriate Laboratory-level documents, training or other requirements implementation methods as appropriate.

NOTE:

The method for translating external requirements into Laboratory subject areas is described in the [Laboratory-Wide Procedures and Guidelines](#) Subject Area.

- 5.4. When conformance with an external requirement or its intent is not possible, either through direct compliance or through an equivalent means of complying, the Management System Steward shall establish a schedule that leads to compliance with the requirement or shall request a variance.
 - 5.4.1. The Management System Steward shall stop work or request equipment be removed from service if non-compliance with an external requirement leads to imminent danger (see [Stop Work Procedures](#)).

NOTE:

The subject area [Requesting SBMS Variances](#) describes the process for obtaining a variance to Laboratory requirements.

- 5.5. The SBMS Office shall communicate all new or changed requirements to line organizations.
- 5.6. The Management System Steward working with the SBMS Office shall ensure all approvals of Laboratory-wide requirements are formally transmitted to BNL's senior management.
- 5.7. Subject Matter Experts shall notify SBMS Office requirements-point-of-contact about new or changed regulations that impact the institution.
- 5.8. The SBMS Office shall issue a notification about new or changed requirements to all line personnel who subscribe to the Notification Subscription Service.